

HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

Case No. 20-cv-00983-TSZ

STIPULATION AND [PROPOSED]  
ORDER STRIKING DEADLINE FOR  
DISCOVERY ON CLASS CERTIFICATION  
ISSUES

**NOTE ON MOTION CALENDAR:  
December 4, 2020**

On October 29, 2020, the Court convened a telephonic status conference to discuss the case and related deadlines, including those related to class certification. During the conference, the parties advised the Court that they had reached agreement on several of the deadlines referenced in the parties' Joint Status Report.

The Court's Minute Order Setting Trial and Related Dates (Dkt. # 27) (Oct. 29, 2020) accurately reflects the parties' agreement and the Court's ruling with the sole exception that it sets a deadline of May 17, 2021, for discovery on class certification issues. The parties do not recall discussing deadline for completing discovery on class certification issues during the status conference and agree that such a deadline is not necessary in light of the Court's ruling that discovery will not be bifurcated in this matter. Accordingly, the parties respectfully request that

the Court amend the October 29 order by striking the reference to the May 17, 2021, deadline for completing discovery on class certification issues.

STIPULATED AND AGREED TO this 4th day of December, 2020.

CALFO EAKES LLP

PETER S. HOLMES  
Seattle City Attorney

By: s/ Patricia A. Eakes

By: s/ Joseph Groshong

By: s/ Angelo J. Calfo

Joseph Groshong, WSBA# 41593

By: s/ Tyler S. Weaver

Assistant City Attorney

By: s/ Andrew DeCarlow

Seattle City Attorney's Office

By: s/ Henry Phillips

701 Fifth Avenue, Suite 2050

Patricia A. Eakes, WSBA #18888

Seattle, WA 98104

Angelo J. Calfo, WSBA #27079

Tel: (206) 684-8200

Tyler S. Weaver, WSBA #29413

Fax: (206) 684-8284

Andrew DeCarlow, WSBA #54471

Joseph.Groshong@seattle.gov

Henry Phillips, WSBA #55152

1301 Second Avenue, Suite 2800

HARRIGAN LEYH FARMER & THOMSEN  
LLP

Seattle, WA 98101

Tel: (206) 407-2200

Fax: (206) 407-2224

By: s/ Arthur W. Harrigan, Jr.

patty@calfoeakes.com

By: s/ Tyler L. Farmer

angeloc@calfoeakes.com

By: s/ Kristin E. Ballinger

tylerw@calfoeakes.com

Arthur W. Harrigan, Jr., WSBA #1751

andrewd@calfoeakes.com

Tyler L. Farmer, WSBA #39912

henryp@calfoeakes.com

Kristin E. Ballinger, WSBA #28253

999 Third Avenue, Suite 4400

Seattle, WA 98104

Tel: (206) 623-1700

Fax: (206) 623-8717

arthurh@harriganleyh.com

tylerf@harriganleyh.com

kristinb@harriganleyh.com

*Attorneys for Plaintiffs*

*Attorneys for City of Seattle*

**ORDER**

The Court hereby AMENDS the Minute Order Setting Trial and Related Dates (Dkt. # 27) by STRIKING the deadline of May 17, 2021, by which discovery on class certification issues must be completed.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2020.

\_\_\_\_\_  
THOMAS S. ZILLY  
UNITED STATES DISTRICT JUDGE

Presented by:

CALFO EAKES LLP

By: s/ Patricia A. Eakes

By: s/ Angelo J. Calfo

By: s/ Tyler S. Weaver

By: s/ Andrew DeCarlow

By: s/ Henry Phillips

Patricia A. Eakes, WSBA #18888

Angelo J. Calfo, WSBA #27079

Tyler S. Weaver, WSBA #29413

Andrew DeCarlow, WSBA #54471

Henry Phillips, WSBA #55152

1301 Second Avenue, Suite 2800

Seattle, WA 98101

Tel: (206) 407-2200

Fax: (206) 407-2224

patty@calfoeakes.com

angeloc@calfoeakes.com

tylerw@calfoeakes.com

andrewd@calfoeakes.com

henryp@calfoeakes.com

*Attorneys for Plaintiffs*

PETER S. HOLMES

Seattle City Attorney

By: s/ Joseph Groshong

Joseph Groshong, WSBA# 41593

Assistant City Attorney

STIPULATION AND [PROPOSED] ORDER  
STRIKING DEADLINE FOR DISCOVERY ON CLASS  
CERTIFICATION ISSUES - 3  
(Case No. 20-cv-00983-TSZ)

LAW OFFICES  
HARRIGAN LEYH FARMER & THOMSEN LLP  
999 THIRD AVENUE, SUITE 4400  
SEATTLE, WASHINGTON 98104  
TEL (206) 623-1700 FAX (206) 623-8717

1 Seattle City Attorney's Office  
2 701 Fifth Avenue, Suite 2050  
3 Seattle, WA 98104  
4 Tel: (206) 684-8200  
5 Fax: (206) 684-8284  
6 Joseph.Groshong@seattle.gov

7 HARRIGAN LEYH FARMER & THOMSEN LLP

8 By: s/ Arthur W. Harrigan, Jr.

9 By: s/ Tyler L. Farmer

10 By: s/ Kristin E. Ballinger

11 Arthur W. Harrigan, Jr., WSBA #1751

12 Tyler L. Farmer, WSBA #39912

13 Kristin E. Ballinger, WSBA #28253

14 999 Third Avenue, Suite 4400

15 Seattle, WA 98104

16 Tel: (206) 623-1700

17 Fax: (206) 623-8717

18 arthurh@harriganleyh.com

19 tylerf@harriganleyh.com

20 kristinb@harriganleyh.com

21 *Attorneys for City of Seattle*